

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

HON. ELAINE L. CHAO,
SECRETARY, UNITED STATES
DEPARTMENT OF LABOR,
Plaintiff,

v.

ALLIED PILOTS ASSOCIATION,
Defendant.

§
§
§
§
§
§
§
§
§

CIVIL. NO. 4-05-CV-338-Y

PLAINTIFF'S RESPONSE TO COURT'S JUNE 19, 2006, ORDER

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff, Hon. Elaine L. Chao, Secretary, United States Department of Labor (Chao), by and through her attorney of record, hereby files this response in compliance with this Court's Order of June 19, 2006, and would respectfully show as follows:

Chao respectfully submits that she does desire the opportunity to file a brief response to Allied Union Services's (AUS) Motion for Leave to appear as *amicus curiae* and to file an *amicus* brief. Such response will be limited in scope to the question of whether AUS's appearance and brief will aid the Court in the resolution of the above-captioned matter. Chao believes that is the standard for this Court to evaluate AUS's motion.

DATED this the 6th day of July 2006.

Respectfully submitted,

RICHARD B. ROPER
UNITED STATES ATTORNEY

s/Tami C. Parker
TAMI C. PARKER
Texas Bar No. 24003946
Assistant United States Attorney
Burnett Plaza, Suite 1700
801 Cherry Street, Unit 4
Fort Worth, Texas 76102
O: 817.252.5200
F: 817.978.6351

OF COUNSEL:
HOWARD M. RADZELY
Solicitor of Labor

DANIELLE L. JABERG
Attorney

EVAN H. NORDBY
Attorney

KATHERINE E. BISSELL
Associate Solicitor, Civil Rights
and Labor-Management Division

SHARON E. HANLEY
Counsel for Labor-Management Programs

COUNSEL FOR PLAINTIFF
SECRETARY, DEPARTMENT OF
LABOR

s/ Sanford R. Denison ("with permission")
SANFORD R. DENISON
Texas Bar No. 05655560
Baab & Denison, LLP
Stemmons Place, Suite 1608
2777 N. Stemmons Freeway
Dallas, TX 75207
(214) 637-0750
(214) 637-0730 FAX

EDGAR N. JAMES*
D.C. Bar No. 333013
STEVEN K. HOFFMAN*
D.C. Bar No. 384696
DAVID P. DEAN*
D.C. Bar No. 437030
James & Hoffman, P.C.
1107 17th Street, N.W., Suite 510
Washington, D.C. 20036-4704
(202) 496-0500
(202) 496-0555 FAX

*Application for Pro Hac Vice Granted

COUNSEL FOR DEFENDANT
ALLIED PILOTS ASSOCIATION

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of July, 2006 I electronically filed the forgoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a Notice of Electronic Filing to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means:

SANFORD R. DENISON
Baab & Denison, LLP
Stemmons Place, Suite 1608
2777 N. Stemmons Freeway
Dallas, TX 75207

EDGAR N. JAMES
STEVEN K. HOFFMAN
DAVID P. DEAN
James & Hoffman, P.C.
1107 17th Street, N.W., Suite 510
Washington, D.C. 20036-4704

s/ Tami C. Parker
TAMI C. PARKER